

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 19 1998

A.W. Hadder, Manager  
Environmental Policy and Compliance  
Virginia Power  
Innsbrook Technical Center  
5000 Dominion Blvd.  
Glen Allen, VA 23060

Dear Mr. Hadder:

This is in response to your original letter dated February 6, 1998 and subsequent letters of clarification dated March 30, 1998 and May 13, 1998 in which you request the EPA's concurrence on Virginia Power's plan for evaluating, servicing and/or decommissioning PCB-containing electrical equipment from external owners of such equipment. We have reviewed Virginia Power's plan and find it to be sound and in accord with the current federal PCB regulations found at 40 CFR part 761.

Please be advised that EPA will be publishing a final rule within the next month that will make wholesale changes to the PCB regulations including transportation, storage, decontamination, scrapping for metal recovery, and disposal. Virginia Power should review these new regulations carefully and, if necessary, amend the above referenced plan accordingly.

If you have any questions concerning these new regulations and how they will effect Virginia Power's operations, you may contact Tom Simons of my staff at 202-260-3991.

Sincerely,

Tony Baney, Chief  
Fibers and Organics Branch

cc: Ed Cohen, PCB Coordinator - Region III

T Simons/OPPT-NPCD-FOB/06-12-98/7404/260-3991/Rm. E835H/Disk#11 A:\VA-POWER  
FILES:NPCD/FOB CHRON READING/SUBJECT: decommissioning electrical equipment

CONCURRENCES							
SYMBOL	7404	7404					
SURNAME	Simons	Baney					
DATE	6-12-98	6/12/98					

EPA Form 1320-1A (1/90) Printed on Recycled Paper OFFICIAL FILE COPY



**VIRGINIA POWER**

May 13, 1998

Mr. Tony Baney  
Chief, Fibers and Organics Branch  
Office of Prevention, Pesticides and Toxic Substances  
U.S. Environmental Protection Agency  
Mail Code 7404 - Waterside Mall  
401 M Street SW  
Washington, DC 20460

Dear Mr. Baney:

With regard to the concurrence requested by Virginia Power by letter dated February 6, 1998, and further explained by letter dated March 26, 1998, we are providing one additional point of clarification, as requested by Mr. Tom Simons of your staff.

The recovered non-PCB transformer oil will be burned for energy recovery in a "qualified incinerator" as defined under 40 CFR 761.3. The recovered non-PCB transformer oil will be burned in Virginia Power steam electric boilers that meet all the requirements of 40 CFR 260.10 and 40 CFR 279.61(a)(2)(ii), as directed by the definition for "qualified incinerator" under 40 CFR 761.3. Although these boilers satisfy the requirements for a "qualified incinerator" under 40 CFR 761.3, Virginia Power has no intention of burning the recovered non-PCB transformer oil for anything other than energy recovery as prescribed under 40 CFR 761.20(e)(3).

If there are any further questions concerning this plan, please contact me at (804) 273-3023.

Very truly yours,

A. W. Hadder  
Manager  
Environmental Policy & Compliance

Cc: Ed Cohen, PCB Regional Coordinator  
Air, Radiation and Toxics Division  
U.S. Environmental Protection Agency - Region III  
841 Chestnut Street  
Philadelphia, Pennsylvania 19107



March 30, 1998

Mr. Tony Baney  
Chief, Fibers and Organics Branch  
Office of Prevention, Pesticides and Toxic Substances  
U.S. Environmental Protection Agency  
Mail Code 7404  
Waterside Mall  
401 M Street SW  
Washington, DC 20460

Dear Mr. Baney:

Virginia Power originally submitted by letter dated February 6, 1998 the attached plan for evaluating, servicing and/or decommissioning PCB-containing electrical equipment from external owners of such equipment. Following discussions with Mr. Tom Simons of your staff, we are re-submitting the plan with the following additional information:

- Any equipment that is transported to the Virginia Power facility will become the responsibility of Virginia Power. If the equipment contains PCB oil with a concentration of more than 50 ppm, Virginia Power will become the generator of record with regard to the PCB regulations under 40 CFR Part 761.
- Since Virginia Power accepts the designation as "generator of PCB waste", the company will not become a "commercial storer of PCB waste" under 40 CFR Part 761.3. Therefore, Virginia Power will not be limited to storing less than 500 gallons of PCB oil.
- As Virginia Power only burns recovered transformer oil containing less than 50 ppm PCBs for energy recovery, it is not "PCB waste" for the purposes of 40 CFR 761.60 (disposal requirements) and therefore it is not required to be disposed of in a "qualified incinerator". However, the recovered "non PCB" oil is tested to ensure it does not exceed any of the specification levels of 40 CFR 279.11 (Standards for the Management of Used Oil). This recovered oil is burned only in Virginia Power boilers under the approval of the Virginia Department of Environmental Quality (DEQ).

Please forward your written concurrence with the attached plan at your earliest convenience. If there are any further questions concerning this plan, please contact me at (804) 273-3023.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. W. Hadder".

A. W. Hadder  
Manager  
Environmental Policy & Compliance

Cc: Ed Cohen  
PCB Regional Coordinator  
Air, Radiation and Toxics Division  
U.S. Environmental Protection Agency  
Region III  
841 Chestnut Street  
Philadelphia, Pennsylvania 19107

## **Virginia Power Plan for Work on PCB-Containing Electrical Equipment from Outside Parties**

### **I. Request for Decommissioning/Disposal of Oil-filled Electrical Equipment**

- a. Equipment will be sampled and tested at the customer's site by Virginia Power or a contractor. Virginia Power's laboratory or a contract laboratory would conduct analysis.
- b. If the concentration is determined to be 500 ppm PCB or greater, the PCB equipment will remain on the customer's property. The customer will be responsible for proper disposal and will be the generator of record.
- c. If the concentration is determined to be 50 to 499 ppm PCB, the equipment will be drained of free flowing liquid either by Virginia Power personnel, a contractor or the customer. The drained carcasses will be transported to Virginia Power's facility for decommissioning for the purpose of disposal or metals recovery. The customer will retain the PCB Contaminated oil for proper disposal and will be the generator of record.
- d. If the concentration is determined to be less than 50 ppm PCB, the equipment with the oil will be transported to Virginia Power's facility. Upon arrival at our facility, the equipment will be pumped and the oil will be batched with other non-PCB oil designated for use as auxiliary fuel at a Virginia Power generating station. The carcass will be properly decommissioned for the purpose of disposal or metals recovery.

### **II. Request for Evaluation, Servicing or Repair of Oil-filled Electrical Equipment**

- a. Equipment will be transported to Virginia Power's facility for evaluation.
- b. All equipment received from the customer will be sampled and tested for PCB content by Virginia Power. (No servicing or repair on the units will be done prior to receipt of the PCB analysis.)

- c. If the concentration is determined to be 500 ppm PCB or greater, no further evaluation, servicing or repair will be conducted and the equipment will be designated for disposal. The PCB equipment and PCB oil will be properly stored in Virginia Power's Annex III storage facility. Disposal will be at an EPA approved facility with Virginia Power being the generator of record.
- d. If the concentration is determined to be 50 to 499 ppm PCB, no further evaluation, servicing or repair will be conducted and the equipment will be designated for disposal. The equipment will be drained of free flowing liquid. The oil will be batched with other PCB Contaminated oils, properly stored and disposal will be at an EPA approved facility with Virginia Power being the generator of record. Virginia Power will properly decommission the drained carcasses for the purpose of disposal or metals recovery.
- e. If the concentration is determined to be less than 50 ppm PCB, the equipment will be repaired and returned to the customer for its originally intended use. Any oil generated from the servicing or repair of this equipment will be batched with other non-PCB oils and used as auxiliary fuel at a Virginia Power generating station.